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**From:** Lisa Contreras-Hendler <lcontreras-hendler@toeroek.com>  
**Sent:** Friday, January 31, 2020 12:27 PM  
**To:** Stanfield, Brooks; Svetlana Furman  
**Subject:** RE: Information Request - Request for Extension

Hi Brooks,

It will be tight, but we should be able to do it. Generally, we estimate this process would take 30 hours, which includes analysis and QA. I checked with my ATP team to confirm their availability, and it looks good.

Our PRP report will be ready to go by then so we would just slip the ATP analysis as an appendix and add the ATP conclusions to the body of the report and conclusions/recommendations. Please note, however, this time table will not allow us to address any omissions in the submittal. This does occur.

We are fortunate it is a Leap Year 😊

Regarding the amount of recovery, shall we (b)(5) attorney-client, (b)(5) attorney work product, (b)(5) ?

Lisa

Lisa Contreras-Hendler, Esq.  
**TOEROEK ASSOCIATES, INC.**  
[lcontreras-hendler@toeroek.com](mailto:lcontreras-hendler@toeroek.com)  
(602) 625-7755

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**From:** Stanfield, Brooks <Stanfield.Brooks@epa.gov>  
**Sent:** Friday, January 31, 2020 2:55 PM  
**To:** Lisa Contreras-Hendler <lcontreras-hendler@toeroek.com>; Svetlana Furman <sfurman@toeroek.com>  
**Subject:** FW: Information Request - Request for Extension

Lisa-

Do you think the proposed date for receiving Mr Hothi's financial documents (Spokane Recycling) would work within your timeframe for completing your work before the end of the POP?

Brooks Stanfield  
Federal On-Scene Coordinator  
U.S. EPA Region 10  
1200 Sixth Ave. Suite 155, 13-J07  
Seattle WA 98101-3140  
[stanfield.brooks@epa.gov](mailto:stanfield.brooks@epa.gov)

(o) 206-553-4423  
(c) 206-379-2996



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**From:** Paramjit Hothi (b) (6)  
**Sent:** Thursday, January 30, 2020 8:27 PM  
**To:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>  
**Subject:** Re: Information Request - Request for Extension

Hi Brooks,

Can you give me until February 21, 2020 to provide you with the information you require for q. 4?

Thanks,  
Parm

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**From:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>  
**Sent:** January 28, 2020 7:00 AM  
**To:** Paramjit Hothi (b) (6)  
**Subject:** RE: Information Request - Request for Extension

Thank you Parm.

-Brooks

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**From:** Paramjit Hothi (b) (6)  
**Sent:** Monday, January 27, 2020 10:03 PM  
**To:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>  
**Subject:** Re: Information Request - Request for Extension

Hi Brooks,

Thanks for this information. I have forwarded this on to my accountant today and will speak with him tomorrow and I will provide you with an update as to when we can get the outstanding information to you.

Parm

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**From:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>  
**Sent:** January 27, 2020 2:09 PM  
**To:** 'Paramjit Hothi' (b) (6)  
**Subject:** RE: Information Request - Request for Extension

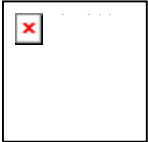
Hi Parm-

Yes. What you can tell your account we're looking for is highlighted under number 4 of the information request letter we sent on October 1. I've reattached that letter and copied in the verbiage from that section below my signature for your convenience. I believe that getting the federal tax returns (as the first item requested in 4.a.) is simple and covers a lot of the information needed, but the more information you can provide here, the better it is for your company.

Let me know if your accountant has any questions.

Brooks Stanfield  
Federal On-Scene Coordinator  
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Emergency Response Section  
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(f) 206-553-0175



#### **4. Financial Information**

- a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2014, 2015, 2016, 2017 and 2018. Provide the federal Tax Identification Number. If documentation is not available, fill out the enclosed IRS Form 8821 to provide EPA with direct access to this documentation from the U.S. Internal Revenue Service.
- b. Complete the enclosed EPA Financial Statement for Businesses Form or provide an audited financial statement that contains all of the information requested in the form.
- c. Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, identify each asset by type of asset, estimated value, and location.
- d. Provide a full copy of the Respondent's asset depreciation schedule for the most recent fiscal year.
- e. Provide copies of the Respondent's five most recent years of audited financial statements, including auditor's opinion, balance sheet, income statement, statement of cash flows and supporting notes and schedules. If audited statements are not available, please submit unaudited financial statements, including balance sheet, income statement, statement of cash flows and supporting notes and schedules.
- f. Provide the Respondent's financial statements for current year to date and the prior year to date (the same period one year ago), including balance sheet, income statement, statement of cash flows, and pro forma statement.
- g. Provide copies of monthly bank statements for all accounts held by or for the benefit of the Respondent that were open or maintained a balance for the last twelve-month period.
- h. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's activities at the Site;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity(ies);
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;
- v. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at the Site; and
- vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

i. Provide any additional information which may be relevant in evaluating the Respondent's ability to pay for cleanup actions at the Site.

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**From:** Paramjit Hothi (b) (6)  
**Sent:** Monday, January 27, 2020 1:23 PM  
**To:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>  
**Subject:** Re: Information Request - Request for Extension

Hi Brooks, can you tell me exactly what you require so that I can ask my account. I have absolutely no issue with providing you with what ever you require.

Sent from my iPhone

On Jan 27, 2020, at 11:38 AM, Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)> wrote:

Hi Parm-

I am checking to see if you have managed to gather any of the tax return information from your accountant. If you have not, I wanted to determine when we could expect that information. My attorney reminded me to restate that submitting those to EPA could lead to a lesser demand from EPA for work or costs.

Thank you.

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(f) 206-553-0175

<image001.jpg>

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**From:** Paramjit Hothi (b) (6)

**Sent:** Thursday, January 16, 2020 9:06 PM

**To:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>

**Cc:** Fowlow, Jeffrey <[Fowlow.Jeffrey@epa.gov](mailto:Fowlow.Jeffrey@epa.gov)>; Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>; Tom McDonald <[tmcdonald@cascadialaw.com](mailto:tmcdonald@cascadialaw.com)>; (b) (6)

**Subject:** Re: Information Request - Request for Extension

Hi Brooks,

Thanks for your reply.

Let me check with my accountant and get back to you in regards to the tax information, but I have provided all that we have.

Yes a phone call would work for us and yes we would definitely like to include Tom in that call.

Sent from my iPhone

On Jan 15, 2020, at 7:39 PM, Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)> wrote:

Mr. Hothi-

I apologize that I haven't been more communicative. The last month or so I have been working pretty steadily on reviewing responses to our 104(e) information request. I met with my attorney today and I have several meetings scheduled in the next week.

We have reviewed your response to our information request and I wanted to thank you for taking the time to put all that together. I did want to circle back and make sure we receive all the information from section 4 (Financial Information). We did get the bank statements you provided but there is still critical information that we still need from that section starting with tax returns from 2014-2018, as outlined in section 4.a. If we can confirm the timeframe that you can provide that information, we would greatly appreciate it.

I think after the meetings I have set up next week, it would be a good point to touch base by phone or in person to go over where EPA is at and where we see things heading at the Spokane Recycling property and the property to the north where the sediment ponds reside. I think we can cover environmental/technical topics as well as legal questions. So that might be a good opportunity for Mr. McDonald to join us. If you'd like to do that, I will start to work with you on finding a day and time that everyone is available.

Thanks again for your communication.

Brooks Stanfield  
Acting Section Chief

Emergency Response Section  
U.S. EPA Region 10  
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[stanfield.brooks@epa.gov](mailto:stanfield.brooks@epa.gov)

(o) 206-553-4423  
(c) 206-379-2996

<image003.jpg>

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**From:** Paramjit Hothi (b) (6) >  
**Sent:** Monday, January 13, 2020 8:35 PM  
**To:** Stanfield, Brooks <[Stanfield.Brooks@epa.gov](mailto:Stanfield.Brooks@epa.gov)>; Fowlow, Jeffrey  
<[Fowlow.Jeffrey@epa.gov](mailto:Fowlow.Jeffrey@epa.gov)>; Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>  
**Cc:** Tom McDonald <[tmcdonald@cascadialaw.com](mailto:tmcdonald@cascadialaw.com)>; (b) (6)  
**Subject:** Information Request - Request for Extension

Hi Brooks,

I am just following up on the request for information that I sent to you. Just wondering if you have any update to this.

FYI - Tom McDonald will also email/call to follow up with you about this too.

Regards,  
Parm Hothi

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**From:** Paramjit Hothi (b) (6)  
**Sent:** October 8, 2019 9:21 PM  
**To:** Leefers, Kristin <[Leefers.Kristin@epa.gov](mailto:Leefers.Kristin@epa.gov)>  
**Subject:** Information Request - Request for Extension

Hi Kris Leefers,

I am in receipt of your attached letter.

As I was in Spokane at the time of arrival I only opened the letter today, on October 7.

I am writing to ask for an extension of up to November 30, 2019 to comply with your request.

Also most of my documentation is pdf files and therefore requesting if all documentation can be sent via email and email attachments.

I look forward to your reply.

Paramjit Hothi

